

Informing Improvement:

Recommendations for Enhancing Accreditor
Data-Use to Promote Student Success and Equity



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OVERVIEW

As the higher education landscape has expanded beyond issues of access and affordability to include an emphasis on student completion and employment outcomes, accreditors can play a leadership role in advancing this important change. A shift to student success that rightfully centers in part on closing equity gaps between low-income students and students of color and their peers ensures that students from all backgrounds have a genuine opportunity to thrive in and after college.

The institutions that have progressed the most have done so through concerted, systemic, and equity-minded use of data to shine a light on those areas where focus and resources are most needed.¹ Indeed, for institutions today, data-use is a prerequisite to making institutional improvement, especially in unpacking and addressing the systemic racial and economic inequities that continue to undermine justice and opportunity within our higher education system. Accreditors, who hold primary responsibility for assuring quality and continuous institutional improvement, can wield enormous power in the drive to improve

ACCREDITORS CAN WIELD ENORMOUS POWER IN THE DRIVE TO IMPROVE STUDENT SUCCESS AT MORE INSTITUTIONS BY USING DATA.

student success at more institutions by using data to shape their conversations with and evaluations of colleges and universities.

However, despite incremental progress, accreditors—primarily regional ones—presently do far too little to integrate and focus on quantitative outcomes data, especially data disaggregated by race and income, throughout the review cycle or as a basis for setting institutional improvement expectations for their accredited institutions. Better data-use is necessary to identify areas of success and areas in need of improvement, to guide institutional improvement processes, and to evaluate equity. Based on a review of accreditor materials and interviews with 10 high-level commission staff from regional, national, and programmatic accreditors, this report seeks to identify current practices, challenges, and opportunities with respect to data-use in accreditation.

We offer three recommendations for proactive steps that accreditors can take to incorporate outcomes-focused, equity-minded data into the entire review cycle to spur more evidence-driven institutional improvement:

1 Recommendation: Embed data-use into routine practice.

Accreditors should use data to explicitly inform their focus and conclusions by routinely leveraging existing federal data sources and, when necessary, requiring institutions to report additional quantitative student outcome data.

2 Recommendation: Emphasize equity. Accreditors should

make equity a higher priority by requiring institutions to report quantitative outcome metrics disaggregated by at least race/ethnicity, and income.

3 Recommendation: Increase transparency about data-use practices.

Building on the progress established by the Council of Regional Accrediting Commissions (C-RAC) graduation rate exercise, accreditors should increase transparency to the public about how they collect data, what data they collect, and how they use data in their review processes.

In discussions with accreditors, many voiced an interest in using data, and this paper profiles promising ways that four accreditors have incorporated data into their work. Building on such examples, accreditors could embed data more thoroughly into continuous institutional improvement efforts to demonstrate their collective commitment to evidence-based decision making. A more thorough focus on data also would demonstrate to policymakers and policy experts that both accreditors and institutions are willing and able to identify and address many of the shortcomings within our higher education system. More importantly, when accreditors make better use of student outcome data, the institutions and all the students they serve can benefit from enhanced and more equitable opportunities and high-quality educational outcomes.

METHODOLOGY

Several stages of research informed the development of this report. First, the authors conducted interviews with a dozen experts to increase our knowledge and inform our understanding of the historical context for accreditors' data-use, the present policy and practice landscape of outcomes-focused accreditation, and in particular, policy-makers' perceptions of data-use in quality assurance. Next, the research team conducted a review and analysis of 10 regional, national, and programmatic accreditors' data-use practices, examining publicly available accreditor materials such as standards, annual guidance and reporting requirements, and a selection of institutional self-studies.²

The core of our research findings, however, are based on conversations with representatives of the accrediting agencies, including regional, programmatic, and national accreditors. These interviews allowed us to better understand the perspectives and experiences of accreditors themselves.

To facilitate the most open and candid dialogue possible, the authors agreed to confer partial anonymity on interviewees; their names are listed in Appendix A, but while this report bases many conclusions on the results of those interviews and provides quotes from the interviews to substantiate those conclusions, we have omitted attribution of these quotations. In instances where interviewed accreditors cited further information, the authors reviewed those materials.

Prior to publication of the final version of this report, we convened several of the accreditors to provide them with the opportunity to review and voice comments about initial findings.

A list of abbreviations and acronyms appears in Appendix B.

SCOPE

This report focuses on the issue of accreditor collection and use of empirical, quantitative student outcomes data, such as the metrics enumerated in *Toward Convergence*, the metrics framework from the Institute for Higher Education Policy (IHEP), which include graduation rates, retention rates, loan repayment rates, and others.³

This report also includes an evaluation of what data accreditors continually collect and use to assess institutional performance, and the barriers to and opportunities for improvement in such reporting and use. While these topics represent only a portion of accreditors' responsibilities for oversight, this report demonstrates the outsized importance that such considerations have for students, institutions, and taxpayers.

We note also that while this report has implications for issues of financial and institutional sustainability, our inquiry did not focus explicitly upon issues of financial oversight on the part of accreditors, which is a substantial responsibility under their purview.

Finally, while this report focuses its findings and recommendations on quantitative metrics such as measures of student access and persistence, graduation rates, and workforce outcomes of former students, we recognize that accreditation encompasses significant activities beyond such topics. The most important of the areas we do not include in our examination is student learning. Although this is clearly a critical element in accreditors' work, we do not address those indicators because at present the information that institutions collect on learning outcomes are difficult to compare across institutions, making that information less helpful for national and state level policy discussions, including this one.⁴ Recent developments in authentic quantitative approaches to learning outcomes assessment may hold promise for more comprehensive data-use in this area in the future.⁵

Definitions

As used in this report, the following definitions apply:

Accreditor: There are broadly two types of accreditation in our system of higher education—institutional and programmatic (the latter is sometimes referred to as “specialized” accreditation). Institutional accreditation, which includes accreditation agencies that are either national or regional in scope, reviews educational institutions. Programmatic accreditation focuses on specific programs within institutions, such as business, engineering, law, or nursing.

There is also a distinction between those accreditors that are “gatekeepers” of federal financial aid like Pell Grants and federal student loans and those that are not. Institutional accreditation (from a national or regional accreditor) is required to participate in Title IV programs. Many institutions choose to acquire both institutional and programmatic accreditation in order to ensure the quality of their programs and the institution as a whole. In those instances when we are referring to a subset of accreditors (e.g. national, regional, or programmatic), we have specified it in the text.

Commission representative: For simplicity and anonymity, when quoting the leaders of accreditation bodies throughout this report, we use the common identifier of “commission leaders” or “commission representative” even though the precise title varies across accreditors.

Student outcomes: Unless otherwise noted, student outcomes refer to quantitative metrics of student success, including but not limited to student retention, graduation rates, transfer rates, and post-college employment outcomes.

KEY FINDINGS

First, some context. In the past, accreditors have been maligned as only focusing on weak input measures—for example, the number of volumes in institutions' libraries—but that is an incomplete and unfair characterization. Accreditation review, because it is based in peer review, has been historically driven by qualitative indicators, judgments founded in peers' professional experience. Now that the higher education field has more fully embraced quantitative indicators as well, it is possible for these to be combined with accreditors' focus on qualitative indicators to provide more meaningful, comprehensive, and proactive quality assurance.

One example of increased attention to identifying meaningful quantitative indicators is the 2018 review of institutions with low graduation rates by the Council of Regional Accrediting Commissions (C-RAC)—a group of regional accreditors themselves.⁶ Some accreditors are working to go further, designing their own measures and methods of incorporating outcome data to inform their reviews, and a few accreditors (especially those that oversee career-focused programs) make accreditation decisions based in part on outcome metrics, some of which include thresholds at which specific consequences apply.

Against this landscape of accreditation's history and these recent developments, this section describes key findings from our research.

1 Finding: Accreditors recognize the value of improving the availability, uniformity, accuracy, and timeliness of federal postsecondary data collections.

The benefits of making more data available. In interviews, nearly all of the commission leaders recognized the value of increasing the quality and comprehensiveness of data made available through federal collections. For example, when discussing new Integrated Postsecondary Education Data System (IPEDS) Outcome Measures (OM), a graduation rate metric introduced by U.S. Department of Education (ED) in 2017 that accounts for transfer and part-time students, one commission representative said, "We're very pleased that they're [ED] doing that [OM]. I think everyone is quite happy about that." This comment was echoed in many of our other conversations.

These comments aligned with one of the primary points of consensus established in the C-RAC graduation rate study: acknowledgement of the importance of using data and, specifically, a shared commitment to improving accreditor use of data. In that report, regional accreditors collectively

What do we mean by "data-use"?

When referring to "use" of data, we are broadly referring to two distinct but related actions. First, we are describing a comprehensive approach to integrating quantitative data on student outcomes throughout each phase of the accreditation process. Specifically, once a group of accreditors receives data from an institution, data-use would include, at a minimum: (1) an initial analysis of data to inform the structure and content of site-team accreditation reviews; and (2) during the accreditation process, ongoing assessment of outcomes, as revealed through data, used to inform conversations, conclusions, and decisions. This type of data-use would enable accreditors to direct limited staff resources and time to institutions evincing the most concerning results on quantitative metrics, allow them to prospectively develop site visits and requests for further written information based on each institution's strengths and weaknesses as revealed in quantitative outcomes, and, finally, to implement collaborative improvement plans that set realistic but aspirational quantitative goals for improvement.

Second, "data-use" may also refer to imposing consequences based on failure to meet a threshold or comply with a set of metrics. These consequences could include probation, orders to show cause, or more severe actions such as revocation of an institution's or program's accreditation. In addition, these consequences can include constructive steps: further investigation into the factors driving performance on specific metrics, or additional accreditor support for institutional improvement in key areas.

Because we frequently are referring to data-use in only one of these senses, to delineate between the two, we refer in the text either to integrating data into the review process or imposing consequences, respectively. In no instance do we use the term to mean only developing bright-line indicators that are used to revoke accreditation.

NEARLY ALL COMMISSION LEADERS SAID THAT A TOP PRIORITY WAS GETTING ACCESS TO BETTER DATA, ESPECIALLY FROM A TRUSTED PUBLIC SOURCE LIKE THE FEDERAL GOVERNMENT.

expressed that they were “fully committed to helping their regions and individual institutions improve their graduation rates and to help policymakers in their efforts to improve graduation rate measures and hold institutions accountable.” The study reported that the same held true for institutions, who recognized that “there is a significant amount of effort” in reporting these figures, and told accreditors that “they do prefer it, that they think they get real value out of knowing how they’re performing relative to these benchmarks and they can use those benchmarks to set goals.”⁷

The need for uniformity across institutions. In addition to acknowledging the usefulness of data generally, most of the commission leaders also sought a common typology of measures and terms, so that data are not only more straightforward to calculate but are more comparable across institutions and programs. They wanted improvements including common, validated definitions of metrics and the ability to report outcomes at various points in students’ educational trajectory. For example, one commission representative said, “I’d love to just come up with a common definition of graduation, what is ‘graduated’? If we could do that, that would solve a lot of problems, but everybody wants to exclude every student from the graduation rate calculation.” Despite these limitations, graduation rates are commonly used by accreditors, but improved federal data could also include better measures of less commonly used factors, such as transfer rates or post-college outcomes.

The value of ensuring data accuracy and timeliness. In our interviews, nearly all commission leaders said that a top priority was getting access to better data, especially from a trusted public source like the federal government which regularly provides data on key measures through sources such as IPEDS, the College Scorecard, and others. These federal data sources contain limitations and are not fully comprehensive, but they are relatively consistent and reliable. Federal data are also available without a fee.

At least one commission leader acknowledged that some of the existing data are only provided at the state level, which is insufficient, since with “state data systems, if it’s not connected to anything else really, you get very incomplete data.” Others recognized the value of the federal government’s role in providing more complete information on student

outcomes, saying: “I think the [student-level data network]⁸ would help. It’s not going to do the whole thing, but I certainly do think it would help.” Another said, “The data I wish I had was what happens to students who drop out. There’s just nowhere to know where they get picked up again, or what happens to them. Do they reappear somewhere? That’s a challenge.” This lack of access to important data is a real barrier to institutional quality improvement and accreditor oversight. One commission representative stated, “If there were data in which we felt sufficiently confident, we might have a bright line minimum number or a regulatory release sort of thing that followed from a top line that we thought was good enough. Problem is, we don’t have them.”

Finding: Accreditors collect several institution-level measures of student access and success.

Progress on incorporating data—but quality and metrics vary across accreditors. A review of accreditors’ standards, institutional self-studies, and annual requests for additional information demonstrates that all accreditors are requiring institutional reporting of several quantitative outcome metrics. In our interviews, most commission leaders agreed that over the last couple of years, “there is an increasing emphasis on using data and an increasing attention to academic quality and academic success, student success.” Many commented that, thanks in part to improved technology, their teams are improving their ability to collect data, and to find data useful.

The choice of metrics, however, varies—sometimes considerably—across agencies (see **Table 1** for specific data collected by each participating accreditor). And it is unclear the extent to which all accreditors use the collected data—of whatever metrics—to drive colleges to improve their performance, which we discuss in more detail below.

Accreditors recognize that more can be done, including improving the quality of data reported by institutions. One commission representative said, “The use of data is a hot topic even at the commission level, and we have a data working-group of staff and commissioners really trying to peel this exact onion of, what are the data elements we need... as well as what are the key data elements that from our policy perspective are most useful to the team members, to the staff in understanding what’s happening at the institution as well as making accreditation decisions.”

Examples of data collection. Here are other ways accreditors are collecting data, supplementing existing data collections, and using data in reviews:

- **Including data from multiple sources.** Accreditors are making efforts to collect data from multiple sources, including IPEDS and the National Student Clearinghouse.
- **Increasing the number of data points.** Over the past several years, accreditors have increased the number of data points collected to provide a more complete picture of changes in performance.
- **Exploring new metrics and a multiple measures approach.** Under the title of the Graduation Rate Dashboard,⁹ the WASC Senior College and University Consortium (WSCUC) developed new metrics for graduation and credit

redemption, intended to supplement the federal graduation rate definition by using multiple measures.

- **Including employment outcomes data.** There is growing commitment, primarily among accreditors overseeing career training programs, to collecting employment outcomes data, including the use of employer surveys.¹⁰
- **Exploring options for measurements through new research.** Emerging accreditation-focused research commissioned by the Higher Learning Commission (HLC) and conducted by its member institutions and other stakeholders has highlighted topics such as ways to holistically measure student success, including accounting for varying student goals and risk factors, and addressing how data can effectively drive improvement.

Table 1: Overview of accreditor data collection

Summarized below is an examination of whether the accreditors reviewed in this report collect various quantitative outcome metrics, and whether those metrics are disaggregated on the basis of race, Pell Grant status, or both. We have selected the most critical metrics articulated in IHEP's "Toward Convergence" metrics framework, and based our initial research into these metrics on the analysis in the Center on American Progress (CAP) report on accreditor data collection and use. This analysis evaluates the collection of these data based on publicly available accreditor information, primarily annual information collections, supplemented in some cases by a sample of institutional self-study documents. Prior to publication of the final version of this report, the accreditors listed were given an opportunity to review and voice comments and concerns, if any.

STUDENT OUTCOME INDICATOR	ABET	ACCJC	ACCSC	ACEN	DEAC	HLC	NECHE	NWCCU ¹	SACSCOC	WSCUC
Total enrollment	●	●	● ²	●	●	●	●	●	●	●
Number of completers	●	●	●	●	●	●	●		●	
Completion rate			●	●	●		● ³	●	● ⁴	●
Cohort default rate			●		●	●	●	●	●	●
Retention/withdrawal rate			●		●		●	●	●	
Licensure/certification passage rate		●	●	●	●		●			
Transfer-out rate		●	●				●	●	●	
Loan repayment rate							●		●	
Employment rate (for career programs)		●	●	●			●			
Median earnings			●						●	
Credit completion										
Credit accumulation										
Gateway course completion										

■ Elements disaggregated by race and Pell status

■ Elements disaggregated by race only

■ Elements disaggregated by Pell status only

1 NWCCU does not require disaggregated reporting on the basis of income or race, but does require the institution to report whether they are designated by ED as one or more classifications of Minority Serving Institutions.

2 ACCSC requires disaggregated reporting of enrollment on the basis of Pell receipt and ethnicity, rather than race.

3 NECHE is the only accreditor that we reviewed that explicitly requested IPEDS OM measures in addition to their own graduation rate measure.

4 SACSCOC collects completion rate data in the form of IPEDS Graduation Rate, IPEDS Outcomes Measure, and National Student Clearinghouse Total Completion Rate; for those institutions that do not report to IPEDS, institutional data is provided directly to SACSCOC using IPEDS completion formulas. SACSCOC disaggregates completion rate on the basis of ethnicity, rather than race.

- **Introducing new data collection tools.** Many also are starting to use more robust data tools, including Salesforce. One commission representative stated that, "We're moving to using Salesforce as a data management system. I was just in a meeting with the presidents of the other regionals. It looks like almost all of us are going to use Salesforce which would give us a common database, a way to share data."

Financial advantages to increased data-use. There is also accreditor recognition of the potential—which has, to some extent, already been demonstrated—to lower the cost and effort of making improvements by using data to diagnose problem areas. One commission representative pointed to lack of resources and staff as a reason to increase use of empirical data to drive decisions: "You know, we're small nonprofits so there's only so much we can do, but the entire universe has improved so much in the last five years that we've been able to do more than we ever could from a budgetary point of view and just from a human resources point of view."

Finally, there was an emerging recognition among several of the commission leaders that were interviewed that better use of data is critical not only to the success of institutions, but ultimately to their survival as well. As one commission representative acknowledged, there are "enormous practical incentives for institutions to do this [given the] declining population of 18-year-olds. So, institutions that want good enrollment statistics have every incentive to work on this. So, it's not just an educational motivation or moral motivation or any of that. It's also really a financial motivation."

3 **Finding: Accreditors repeatedly refer to "using" data in reviews, but there is little evidence that many accreditors integrate data into the review process or base consequences on data.**

Differences among regional, programmatic, and national accreditors. The recent effort of regional accreditors, through C-RAC, to identify and work to improve institutions with low graduation rates is an important example of accreditors' progress on using data—which resulted in a study and report of regional accreditors' analysis of graduation rate data. Through that study, accreditors identified institutions that needed immediate accreditor involvement.

The report's findings also reflected how seldom accreditors leverage the data that are collected. For example, while many accreditors have long collected graduation rate data, the C-RAC report spurred them to ask their low-performing

IT'S NOT JUST AN EDUCATIONAL MOTIVATION OR MORAL MOTIVATION OR ANY OF THAT. IT'S ALSO REALLY A FINANCIAL MOTIVATION.

institutions for plans on how to improve, with at least one accreditor requiring additional reporting and justification from several institutions with low graduation rates, in one instance feeling that issues identified through the data justified a site visit. Without these C-RAC-inspired ongoing evaluations, there is a strong possibility that these problems would not have been proactively identified.

Although most accreditors say they use data frequently, when pressed on what that data-use looks like, regional accrediting bodies often did not provide evidence that data drives specific decisions regarding accreditation or improvement requirements, outside of this recent C-RAC effort.

One programmatic commission leader straightforwardly agreed with this conclusion in terms of accreditation practices, stating that "We're probably using less data than you might have imagined." This commission representative seemed to signal there was indeed some level of low performance that would signal negative consequences, though it is unclear what such consequences would be: "Reporting that [outcome] data does not influence our accreditation decisions directly. Although, let me just give you a caveat. If it turned out an institution, a program that we went to visit, was graduating less than 5 percent of the students, it would be an issue for us."

Other descriptions of data collection and use that many accreditors shared during interviews were nonspecific: there were repeated mentions of "exploring" predictive analytics, conducting additional research, and "supporting improvements" at institutions.

Our interviews and a review of underlying accreditor documentation confirms what previous research found¹¹—the national accrediting bodies we reviewed are further along not only in evaluating the data they collect but in using those data to set benchmarks and in some cases to hold institutions accountable when they fall short. In fairness, national accrediting bodies have relatively fewer barriers to implementing such a system, both because of the relative homogeneity of their institutions (as compared to regional accrediting bodies) and the predominantly career-focused nature of the educational offerings, which make it easier to compare measures such as earnings, employment, and licensure passage rates. However, national accrediting bodies—such as the Accrediting Commission of Career Schools and Colleges (ACCSC) have still put in the effort necessary to identify and define these measures, including

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DATA SHOULD BE USED TO DESIGN OR FOCUS TECHNICAL ASSISTANCE, IDENTIFY HOW TO BETTER ALLOCATE RESOURCES, AND CONNECT INSTITUTIONS WITH PEERS FOR ASSISTANCE AND LESSONS LEARNED.

requiring surveys and audits in some cases (see more detail in the **Case Studies sidebox**). Those efforts could be replicated or adapted to the regional and programmatic contexts.

Improvement and consequences. Improvement and consequences should be closely linked. But, significantly, we have seen no compelling evidence that institutions that do not improve on student outcome measures are at risk of real consequences, like loss of accreditation. For example, the C-RAC report noted that when HLC conducted a study that assessed what various institutions do to improve graduation rates, they found that institutions “Monitor course completion rates of their students; Monitor the transfer-out rate of students; Set a target graduation rate; Monitor the graduation rate of students who are not included in the IPEDS graduation rate reported to the U.S. Department of Education.” Another regional commission representative said, “We will see how well they’re doing, recognizing you don’t change graduation rates overnight. But to at least make sure they’re at least making progress in moving forward.”

This monitoring is a necessary prerequisite to encouraging appropriate institutional responses but monitoring alone is insufficient to ensure institutions are making continuous improvements for all students, particularly low-income students and students of color. In this sense, data should be used to design or focus technical assistance, identify how to better allocate resources, and connect institutions with peers for assistance and lessons learned.

Our study found that some accreditors—both regional and national—are making a more explicit commitment to using data to set benchmarks that would, at minimum, result in this type of targeted continuous improvement in response to institution or program-level performance issues. For example, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) is attempting to benchmark its diverse institutions by having institutions themselves set benchmarks and comparison peer groups—with initially encouraging results (see more detail in the **Case Studies sidebox**).

For those accreditors that do set benchmarks, commission leaders emphasized that a failure on a benchmark does not serve as a basis to revoke accreditation; instead, a drop or a failure on a metric begins a collaborative evaluation and improvement process. One commission leader said, “don’t

get the impression that if a program dips below the benchmark, it’s automatically done. It’s the beginning of an analysis and sort of beginning of the conversation around, all right, what’s going on with this program?” By the same token, however, reaching the benchmark is not the end of the oversight evaluation. The same commission leader expressed this sentiment, noting that “the benchmark is not your goal. If you’re just shooting for the benchmark, congratulations, you’re below average.”

Another commission representative offered a different reflection on tying consequences to data, saying “Just like any other standard, when they’re out of compliance, they’re out of compliance. At some point, it could end up that they’d be on warning or probation or drop from membership.... We don’t have though, what I would call or what Margaret Spellings used to call ‘bright line indicators,’ for graduation rates or anything else.”

4 **Finding: Accreditors very rarely disaggregate data for purposes of promoting racial, ethnic, and socioeconomic equity.**

Our higher education system continues to perpetuate racial and socioeconomic inequities in college enrollment and completion.¹² Yet, some institutions have narrowed or closed equity gaps, promoting high levels of success for all students and demonstrating that what institutions do matters. It is also true that, as arbiters of quality at colleges and universities, what accreditors do matters in ensuring that students of color and students from low-income backgrounds benefit from high levels of postsecondary quality—just as their white and wealthier counterparts do.

In our interviews and research, however, we found that apart from a few instances, accreditors do not require data disaggregation by race or income nor do they focus explicitly on equity. The sole metric we found to be collected on a disaggregated basis by multiple accreditors was enrollment. Only one accreditor collected disaggregated data on graduation rates on the basis of both race and Pell status, while one accreditor disaggregated graduation rates and the number of completers for Pell status only. Finally, one accreditor looked at loan repayment rates disaggregated by Pell status (see **Table 1**). Accreditors otherwise do not collect or require disaggregated data by race or income, even though disaggregated leading indicator metrics, such as retention, credit accumulation, or gateway course completion could be especially useful for continuous improvement efforts because they would allow accreditors and institutions to take action in real time, helping students while they are still enrolled and identifying and addressing equity problems as early as possible.

Case Studies

Some accreditors are proactively using data in innovative and productive ways. Not all practices will be universally applicable in separate accreditation contexts, however, and it is unrealistic to assume that all accreditors could undertake identical initiatives. These examples illustrate a few ways accreditors have demonstrated not only a commitment to the importance of data-use, but the ability to overcome shortcomings of existing systems by proactively making voluntary improvements. Accreditors have opportunities in several contexts—including the Council for Higher Education Accreditation (CHEA) and C-RAC—to share promising practices and learn from one another, and we recommend that accreditors leverage these chances for collaboration to make improvements to their existing processes.

SACSCOC measures progress against baseline performance on completion metrics.

SACSCOC has addressed the challenge of diverse institutional missions and student populations by offering institutions several completion metrics from which to choose. In 2017-18, member institutions with undergraduate programs were asked to identify a key student completion indicator from the following completion metrics: (1) the completion rate based on the data annually reported to SACSCOC by member institutions, (2) the “traditional” IPEDS overall graduation rate (within 150 percent of time), (3) the IPEDS Outcome Measures (8-year award rate), and (4) the National Student Clearinghouse total completion rate (6 years). The institution’s performance on that year’s selected key student completion indicator was used to create a baseline performance level, and subsequent performances were compared to baseline levels.

At that time, the Commission also asked institutions to select approximately 10 institutions they considered to be their peers in the region. As a result, the Commission was able to provide each member institution with its own performance data using their preferred completion indicator, along with the average performance of their peers on that metric. Institutions were then asked to include a discussion of student success dynamics on the selected key completion indicator in the decennial Compliance Certification Report and in the Fifth-Year Interim Report. Ongoing peer evaluation committees have used this information as context to inform their reviews.

ACCSC defines completion and employment metrics and thresholds.

ACCSC relies on a variety of information when reviewing institutions and programs. More specifically, since 1998, ACCSC has focused their student achievement metrics on graduation rates and employment rates using data they collect outside of federally provided data. ACCSC has calculated its graduation and employment benchmark rates based on cohorts of students who start in the same program at the same time. Graduation is measured at 150 percent of normal time to program completion, and the employment rate measure three months after graduation to allow for students to secure a job.

Once every cohort’s graduation and employment rates are calculated, the data is aggregated to establish a graduation rate and employment rate for each program. Those rates are then evaluated relative to ACCSC’s published graduation and employment benchmarks. Graduation rate benchmarks vary based on program length and are set one standard deviation below the average graduation rate for programs of similar length. The employment rate benchmark is set for all program regardless of length because the correlation of a program’s length to its employment rate is not as great as it is for graduation rates. For example, the established benchmark graduation rates for programs 1-3 months is 84 percent, for programs 10-12 months is 55 percent, for programs 19-23 months is 43 percent, and for program 24 months and greater is 40 percent. The established employment rate benchmark is 70 percent for all programs.

Every year ACCSC members submit graduation and employment data, allowing ACCSC to assess performance and evaluate what actions, if any, need to be taken to press quality vis-à-vis student achievement. When a school or program approaches a benchmark “danger zone” this sets off a figurative alarm; at that moment, ACCSC may require more information, detailed reporting, or heightened monitoring. Later repercussions could include an on-site visit, and if the program still does not improve, the Commission would likely revoke a program’s approval or take an institutional action such as a Warning or Probation.

continued on page 12 ▶

Case Studies, continued from page 11

ACEN benchmarks program performance on completion, job placement, and licensure pass rates.

As an accreditor for nursing programs at a wide variety of degree levels, the Accreditation Commission for Education in Nursing (ACEN) emphasizes continuous self-assessment and focuses on several outcome measures. These measures include program completion, job placement, and licensure examination pass rates—the latter of which is assessed at the state level.

In regard to program completion and job placement, ACEN requires institutions and programs to set their own benchmarks of success using measurable, realistic, and reasonable expected levels of achievement (ELA) for completion and job placement rates. In each annual report, institutions and programs must identify their assessment methods and specify how their performance compared with the ELA. While institutions and programs set their own ELA benchmarks, ACEN is involved in that process and provides encouragement and support to nudge programs towards continuous improvement.

For licensure examination pass rates, each State Board of Nursing regulates nursing standards and sets the pass rate for nursing programs in their respective states. ACEN decided to adopt 80 percent, the most common pass rate set across a majority of states, as their benchmark. Once licensure exam information is published for a given year, the institution and program must report that data and assess how well they performed in relation to the 80 percent benchmark.

Overall, and arguably most importantly, institutions and programs must collect assessment data to measure against these expected levels of achievement and licensure pass rates, analyze that measurement, and provide documentation demonstrating that the assessment data are being used to maintain and improve student outcomes.

WSCUC creates a graduation rate dashboard (GRD) metric and embeds key indicators in the institutional review materials.

WSCUC emphasizes “multiple measures,” including the Graduation Rate Dashboard (GRD) it developed to complement and fill in some of the deficits that existed in 2014 in IPEDS. The GRD sought to build upon existing first-time, full-time federal graduation rates and aims

to do so in a way that counts all students regardless of how they enrolled (first-time or transfer, lower or upper division, part-time, full-time, and for all types of degree programs).

The GRD collects six data elements to quantify both the Unit Redemption Rate (URR) which measures the proportion of credits that can be ascribed to a particular institution toward a student’s degree completion, and the Absolute Graduation Rate (AGR) which uses the URR to develop an estimate of the proportion of entering students at an institution who successfully graduate regardless of how long it takes them. One benefit to using URR is that it is not dependent on a fixed timeline and tends to be more sensitive to how much time, effort, and money students invest in an institution prior to dropping out.

WSCUC requires schools to “engage” with the GRD, meaning institutions must be able to have a meaningful discussion about GRD and any other outcomes that matter to them, how they measure those outcomes, and how they connect outcome data and other indicators to student success improvement.

WSCUC has also started to present a few “key indicators” to lead off its internal institutional review materials, so that at every stage the review team, decision-makers, and staff are attuned to basic performance metrics and context. The current data points available across the agency’s universe of institutions are graduation rates (4- and 6-year IPEDS plus the GRD), overall graduate and undergraduate enrollment and percent Pell enrollment, cohort default rate, total expenditures, and federal financial composite score. WSCUC uses these measures to call attention to outcomes in preparing lines of inquiry for discussion with institutions and to identify areas of possible concern or effectiveness. This opens the door for schools to share and reflect on additional data they find most revealing and useful for understanding where they are and whether their efforts are making a difference. WSCUC’s next steps include (1) building out trend and then comparative information to deepen the conversation, (2) continuing to prepare site evaluators and staff to be consistent and skilled in guiding effective exploration of outcomes relative to accreditation standards, and (3) incorporating existing student learning outcomes measures and identifying additional high-value metrics, especially for post-graduate success, to include in this process.

These findings about the lack of data disaggregation were reinforced in our conversations with accreditors. One commission representative said that while the accreditor's staff evaluates data disaggregated "by Pell status, we have not yet looked at the other demographic information. We'll look at HBCU[historically black colleges and universities] rates versus PWI [primarily white institutions] rates. But otherwise, we don't use the racial or gender data. We haven't." Other commission leaders were more blunt in their assessments of data disaggregation. One said, "we do not disaggregate data" based on race, ethnicity, income, or disability status; another said, "we don't really get into... we don't ask for demographics." Finally, a third commission representative commented, "this [improving results for historically underserved students] is not the focus of accreditation. I can't count the number of times I have heard 'if only accreditation agencies required X.' The agenda for accreditation agencies is improving educational quality for all and to be a reliable source for judging educational quality. That is our charge by the federal government and this must be our focus. If we fail in our charge, then we won't exist and then everyone loses. Accreditation isn't here to solve social issues."

AS ARBITERS OF QUALITY AT COLLEGES AND UNIVERSITIES, WHAT ACCREDITORS DO MATTERS IN ENSURING THAT STUDENTS OF COLOR AND STUDENTS FROM LOW-INCOME BACKGROUNDS BENEFIT FROM HIGH LEVELS OF POSTSECONDARY QUALITY—JUST AS THEIR WHITE AND WEALTHIER COUNTERPARTS DO.

Our review of standards and public documents underscored these comments, showing that many accreditors have not demonstrated a public commitment to addressing equity considerations by incorporating equity or data disaggregation requirements into their standards and policies (see the **Sidebox on Equity, Diversity, and Inclusion Policies** for notable exceptions).

Although data disaggregation is not enough, in and of itself, to focus institutional resources and commitment toward students who have been historically underserved by higher education, it is a necessary precondition to such efforts. Without such data disaggregation, institutions and programs will not be aware of access and success gaps between their students of color and white students, much less will they be able to evaluate whether interventions to close such gaps are effective over time.

Equity, Diversity, and Inclusion Policies

Only two regional accreditors explicitly mention equity or disaggregation in their standards and policies, and only a few nod to the related issues of diversity and inclusion. Those who do reference equity include WSCUC, whose "equity and inclusion policy" states that a "commitment to student learning and success requires that institutions actively seek to support the success of all of their students" and that institutions must demonstrate "the willingness and capacity to identify and address equity concerns among campus constituents."¹³ WSCUC also evaluates equity by requiring institutions to compare academic success of subgroups of students, and evaluates inclusion by requiring institutions to measure general student satisfaction and campus climate.

Similarly, the Accrediting Commission for Community and Junior Colleges (ACCJC) requires that each institution "disaggregate and analyze learning outcomes and achievement for subpopulations of students. When the institution identifies performance gaps, it implements strategies, which may include allocation or reallocation of human, fiscal and other resources, to mitigate those gaps and evaluates the efficacy of those strategies."¹⁴ ACCJC also requires that institutions' educational methods must "reflect the diverse and changing needs of its students, in support of equity in success for all students."¹⁵

Other accreditors do not address equity in outcomes, but do have standards that signal the importance of diversity and inclusion. For instance, HLC requires that "the institution's processes and activities reflect attention to human diversity as appropriate within its mission and for the constituencies it serves"¹⁶ and that "the institution engages with its... constituencies and communities of interest and responds to their needs."¹⁷ The New England Commission of Higher Education (NECHE) requires that "the institution addresses its own goals for the achievement of diversity among its students and provides a safe environment that fosters the intellectual and personal development of its students."¹⁸

Finding: Accreditors face real but surmountable obstacles that impede progress on improving data collection and use.

The realities of our higher education system and limits around federal data collection create barriers to systematic and continuous accreditor use of data—barriers that may become more complex as new types of programs become more common, such as very short-term programs, direct assessment (credit for prior learning), competency-based assessment, and subscription models, which allow students to use self-directed study to complete course or credential requirements on a non-regularized schedule.

These issues are real, but they do not represent insurmountable barriers that prevent improved data collection and use. Barriers cited by accreditors—and attempts to address them—include:

Diversity of institutions and programs. Many accreditors oversee a wide range of institutions and programs, creating complexities in developing robust data-use frameworks, and most commission leaders noted that this variation was the most significant barrier to their improved collection and use of data. Even among accreditors that predominantly oversee a single type of institution (such as four-year degree granting institutions), those institutions may vary widely in their programmatic offerings, including graduate studies, shorter term or career-oriented programs, or locally-focused programs. One commission representative said, “We do not use a placement rate, because that’s just not going to work when most of your students and programs are for working professionals like our schools.”

National and programmatic accreditors, however, have a relative advantage over regional accreditors when it comes to standardizing metrics across institutions. Because their member institutions are typically more uniform in their design and student profile, it is easier to define common metrics and set benchmarks for comparison.

At our convening, some commission leaders suggested that accreditors with just a few institutions of a particular type could collaborate with other agencies who have more institutions in that category to get a fuller comparison group and/or more context for comparative performance.

Improving, but still incomplete nature of first-time, full-time graduation rates. For years, due to shortcomings of the federal definition of graduation rate, the only federally available data on graduation rates was limited to first-time, full-time students, representing only about half of today’s college-goers.¹⁹

The C-RAC report based a significant portion of its findings on the problems with that metric for institutions with high rates of transfer. But while the report included some discussion of the new IPEDS Outcome Measures (OM), which addresses a significant number—albeit not all²⁰—of the measurement issues and is already freely available to the public, it does not provide justification for why OM should not become one key method of measuring completion in the near term. Indeed, some institutions and accreditors have already addressed some of these shortcomings by looking at trend analyses, multi-year averages, multiple measures, or a variety of data sources. And, in more thorough conversations with accreditors, they indicated less dire concerns about the limitations of the federal graduation rate measure. During our convening, many accreditors stated that, while available metrics still have limitations, such as a lack of shorter term outcomes and data on what types of institutions students transfer to, they are less concerned today about having to work around the limitations of first-time, full-time graduation rates than they have been in the past. More broadly though, the fact remains that well-crafted and valid measures require more thought and effort than simply flipping a switch labeled “better data.”

Furthermore, the addition of OM to IPEDS shows that federal data collections can be improved in response to field pressure. Accreditors can be strong advocates for specific improvements to federal data systems to facilitate their own data-use practices—and should continue to identify what is needed for the field and advocate to policymakers for improvements.

Lagging outcome metrics. Graduation-rate measures are retrospective, lagging indicators and do not demonstrate more recent institutional changes. Institutions that would be considered as having “low” graduation rates can shift significantly from year to year and so any single-year measure risks overreaction. Conversely, institutions that may have evinced no warning signs for several years may have sudden negative changes that would not be reflected in averages over time, so both averages and sudden changes should be considered for a holistic institutional view. To give credit to institutions that are currently improving, several commission leaders suggested supplementing lagging indicators with others that are more immediate and can provide context—like retention or gateway course completion. One commission representative said in our interview “Graduation rate indicators are always lagging indicators so six years out hopefully these institutions have really done some stuff in the past six years.... Sometimes retention data for us is more important because it’s something that’s happening this year.”

Lack of accreditor and institutional resources. Many accreditors cited a lack of financial, technical, and human capital resources as a barrier to more robust data collection and use, which lead to difficulties in determining which metrics to prioritize. One accreditor said, “Our data system is very antiquated. So, we’re not able to do in-house the level of analysis that we would like.” Similarly, on the institutional side, many institutions with fewer resources lack in-house institutional research departments or dedicated staff available to collect, evaluate, and provide numerous outcome indicators on an annual or ongoing basis. A commission representative said, “The wealthier institutions have greater capacity to collect and use data than the ones that are struggling which are more likely to have the students who are struggling as well. So, there is a kind of a rich-get-richer phenomenon here.”

However, accreditors generally said they are increasing their research and analytics personnel and devoting more resources to data-related efforts. As mentioned above, several accreditors noted ongoing efforts to adopt a more modern system, with Salesforce often mentioned as an example, to leverage analytical capabilities to facilitate data-use and data sharing among accreditors.

Similarly, in our convening several commission leaders expressed incredulity that a lack of accreditor and institutional resources should prevent improved data collection and use. Common responses we heard included, “get started with the data and capacity you already have,” “leverage technology to lower staff costs,” and consider working together to jointly request National Student Clearinghouse data at a group rate, lowering per-accreditor costs of accessing the dataset.

Lack of common taxonomies, definitions, and processes. The range and divergence of, for example, the measure of a graduation rate across institutions, accreditors, states, and ED makes baselines, comparisons, and generalizable findings more difficult—and, in turn, makes standardized processes such as data requests from states much more time-consuming and difficult than if standard data were commonly available. For example, programmatic accreditors seeking state licensure passage rates across several states often must engage in a process that is much more complex than simply submitting a request for a single data file on passage rates. Since the method of requesting varies state by state there is no common data set or file type,

and many state offices are understaffed. One accreditor reported both frustration and progress: “Trying to get information from states and licensing organizations about larger student performance as compared to one institution is a challenge, but it’s getting better.”

Potential to use data-driven assessment in reductive, punitive ways. Some claim that the increasing transparency of decision-making—and the institution-level or program-level data that led to such determinations—could be used to punish institutions or accreditors themselves. One commission representative remarked that “Something I found troubling and challenging is how data in the last five to eight years that was put out in public domain turned out to be weaponized in a way. A way to claim misrepresentation, a way to say accreditors were doing a terrible job of monitoring what their institutions do, when really it was a good faith effort to try to start sharing.”

Similarly, others argued that increased transparency would undermine the trust that is important in the peer review process: “We’re not out there to bust anybody. We’re not out there to degrade or... we want programs to be successful. We want them to be healthy. We want to help them get there. So, it has to be a really trusting relationship. When you have that kind of situation, we can’t just turn around and make the data available to everyone.” Other explanations include the argument that open admissions policies prevent institutions from exercising influence over the success of their students and that institutions are “doing their best” and should not be forced to address outcomes like graduation, debt, or employment that some accreditors claim are outside of institutional control or influence.

Certainly, there are ways in which accreditors walk a fine line between wanting to create trusting, honest relationships and wanting to speak frankly about institutions that fail to deliver adequately to their students—even, in some cases, due to indifference or negligence. One commission representative acknowledged, “We’re not well-equipped to deal with bad actors. We are used to dealing with idealistic, highly committed institutions who are doing their best for their student population. Who can get better by learning from each other. So, I understand the need from a policy point of view to actually arm us also with ways to identify the bad actors that may be entering this field for other reasons.”

While these points reflect the sometimes-difficult realities of effectively implementing data and improving the quality of higher education, the fact that other accreditors—and institutions themselves—have addressed some or even all of these issues, shows that more can be done despite challenges.

RECOMMENDATIONS

Incorporating thoughtful data-use into institutional and accreditor policies and practices can have tangible, positive effects for students, especially students from low-income backgrounds and students of color. Disaggregating data should encourage more complete conversations about completion by spotlighting equity gaps to spur deeper evaluation of the systemic inequities that may be embedded in institutional policies and practices. Disaggregating data can also advance specific remedies, based on problems identified through data and progress or challenges monitored through data, informing improvement efforts. For example, institutions like Florida State University, San Diego State University, the University of Wisconsin-Eau Claire, and Georgia State University have all improved student outcomes through a deliberate focus on data.²¹ Furthermore, by systemically incorporating data into institutional improvement efforts, accreditors can signal to policymakers that they recognize their responsibility to address low-performing institutions in evidence-driven ways.

While these recommendations are most critical for accreditors serving in a Title IV gatekeeping role, because of their critical role in protecting students' and taxpayers' interests, particularly in cases where persistently low-performing institutions and programs fail to live up to their obligations, they are also relevant to the work of accreditors who do not serve such a gatekeeping role. These accreditors are arbiters of quality and continuous improvement in their own right, and these recommendations will benefit the students enrolled at the institutions and programs they oversee.

1 Recommendation: Embed data-use into routine practice.

Accreditors should use data to explicitly inform their focus and conclusions by routinely leveraging existing federal data sources and, when necessary, requiring reporting of additional quantitative student outcome data directly from their institutions.

Each institutional accreditor has the difficult task of overseeing dozens or sometimes hundreds of institutions, each of which has a distinct profile and mission. Although this can create challenges, it does not mean that empirical outcomes data cannot be used to compare similarly situated institutions, provide early warnings before institutions come up for review, or inform the site review process. Indeed, during our convening of accreditors, most commission leaders agreed that even if current data are not yet optimal, they should nevertheless work with their institutions to evaluate the data that are available while working to make improvements on other data availability.

Accreditors should integrate data into their review processes in the following ways:

Routinely collect, monitor, and act on multiple measures.

Accreditors should collect data in ways that align with field efforts, as summarized in IHEP's "Toward Convergence" metrics framework—at least every two years for all institutions and programs, and annually for institutions or programs that manifest worrying quantitative results on student outcome measures. Many accreditors have already recognized the importance of using multiple measures, as indicated by the conclusions in the C-RAC report.²²

It may be appropriate for different accreditors to emphasize different metrics based on mission, or even to emphasize different metrics for different types of institutions if the accreditor oversees a heterogeneous pool. But it is critical that accreditors set out clear expectations for their institutions so that the public has an assurance that the institution they attend (and for which they are receiving Pell Grants and student loans) meets a minimum level of quality.

Wherever possible, accreditors should rely on federal data sources, such as IPEDS, the College Scorecard, and the Federal Student Aid Data Center. Using common data sources, especially those freely available from ED, maximizes consistency of metrics and minimizes burden on both institutions and accreditors. Accreditors should also consider alternate data sources, such as the National Student Clearinghouse or state data dashboards, and only in those instances where critical data are unavailable elsewhere should accreditors collect data directly from institutions—to minimize duplication of effort on the part of both institutions and accreditors. Because accreditors are better equipped to drive consequences with their institutions, as opposed to the federal government's single, binary option of allowing or cutting off federal aid eligibility, their greatest value-add lies in interpreting data and using it to drive conversation with institutions and programs, rather than building extensive data warehouses requiring specialized analytic capabilities.

Disaggregate student outcomes by at least race/ethnicity and income/Pell status. As discussed in more detail in Recommendation 2, accreditors should not presume that aggregated performance metrics suffice to surface the quality of the institutions they oversee. As has been repeatedly demonstrated, many institutions and programs have failed to provide the educational resources, supports, and inclusive environment necessary to serve students historically underserved by higher education. It is critical that accreditors collect outcome metrics disaggregated by income and race to determine how institutions are serving low-income students and students of color and then act

upon these disaggregated results to promote a more equitable higher education system. As we discuss more fully below, we believe improvements in federal data sources should, in the longer term, ease the burden on accreditors of collecting such information.

Until then, accreditors will need to collect some of these outcomes data by requesting information from institutions that is not readily available from other sources. Given the importance of evaluating outcomes for underserved students, this additional collection is worthwhile. To simplify this process in the long term, accreditors should add their voices to calls for improved data collections at the federal level so disaggregated results can be published nationwide in a more comprehensive way.

Prioritize accreditor resources and actions based on student outcome benchmarks. As EducationCounsel has previously explored, our system of higher education would benefit significantly if accreditors provided oversight and quality assurance based on a risk-informed framework—as not all institutions and programs require the same level of resources and oversight. As EducationCounsel has commented, “instead of requiring the institution to comply with every requirement and regulation, institutions would instead comply with some baseline rules. Accreditor assessments that reveal issues would give rise to additional action on the part of regulators and/or their non-governmental partners that ranges from requiring more information or participation in technical assistance programs, mandating corrective action, or—at worst—applying sanctions.” Performance on outcomes metrics across institutions would enable accreditors to prioritize their resources to institutions showing the most risk to taxpayers and students.²³

Ideally, these efforts will lead to review cycles that incorporate data proactively at every stage of the regular institutional review process (this typically occurs every several years, although the specific number of years varies by accreditor), allowing accreditors and their peer review teams to take a targeted approach. Unfortunately, some accreditors reverse this approach—reviewing quantitative outcome metrics only if a review team perceives a lack of quality. For example, one commission representative described the process like this: “If we have a team that goes in and they see that the quality isn’t looking good, in what’s going on in the classroom and all that, they’re likely to take a peek—they’re not required to—but they’ll take a peek at the assurance system to say, ‘oh, well it’s showing in the graduation rates because there’s only a three percent graduation rate.’” If, instead, a team were armed with empirical

IT IS CRITICAL THAT ACCREDITORS COLLECT OUTCOME METRICS DISAGGREGATED BY INCOME AND RACE TO DETERMINE HOW INSTITUTIONS ARE SERVING LOW-INCOME STUDENTS AND STUDENTS OF COLOR AND THEN ACT UPON THESE DISAGGREGATED RESULTS TO PROMOTE A MORE EQUITABLE HIGHER EDUCATION SYSTEM.

outcome metrics on the front end, that knowledge could trigger a much different review process, set of inquiries, and required responses.

Accreditors have many touch points with institutions each year, and accreditors do conduct oversight outside the regular review cycle. To target these efforts and objectively determine where deeper intervention is necessary, accreditors should establish minimum standards below which specific consequences apply, and graduated thresholds that encourage continuous improvement. Many commission leaders reflected on the importance of nuance in describing “consequences.” ACCSC, for example, sets bright-line thresholds to measure performance; nevertheless, failure on a particular metric in a given year will not trigger loss of accreditation, but will instead trigger a deeper inquiry into the reasons why such performance data are below acceptable thresholds.

This approach is appropriate as an initial response. The first step is to start a conversation about the specific ways an institution or program can improve, rather than issuing an overly reactive knee-jerk response to a single year of poor performance. However, continued performance below benchmark thresholds—absent mitigating circumstances, which can be demonstrated through supplemental data (quantitative and qualitative)—must be met with increasingly serious responses, including targeting additional accreditor resources and site visits, instituting enrollment caps, and in cases where failure to improve continues, revoking approval for low-performing programs and revoking accreditation.²⁴

Indeed, ACCSC, who has used performance thresholds for more than two decades, confirmed that increasing consequences were a necessary component of their oversight functions to ensure that member institutions take seriously initial warnings to improve. As one commission representative recognized, “If it’s a more systemic kind of thing and multiple programs have outcome issues and institutions aren’t able to work through those outcomes issues, unable to recognize those outcomes issues, aren’t able to mitigate or correct those outcomes issues, then that rises to the

level of institutional action of revoking or withdrawing an institution's accreditation. But if it's just a single program that they're trying to work through and again, the institution is being a bit dense about coming to this conclusion on their own, our commission is much more apt to say we're ceasing approval of this program."

This type of ongoing, tiered performance monitoring would:

- Enable accreditors to proactively identify institutions or programs that may present particular risk to students and taxpayers;
- Allow accreditors to prioritize staff and resources to the institutions that need it most—including extending the review cycle for high performers, freeing up more resources to focus on poor performers;
- Help identify institutions that have improved over time or that serve low-income students and students of color particularly well; and
- Facilitate sharing of lessons learned across similar institutions.

Recently, regional accreditors signaled their ability and willingness to experiment with this type of approach by agreeing on a common graduation rate metric and associated thresholds. As part of a C-RAC exercise, accreditors took a closer look at four-year institutions that had graduation rates at or below 25 percent and two-year institutions that had graduation rates at or below 15 percent.²⁵ During our convening, commission leaders also expressed some willingness to have "heightened attention" based on zones or ranges of concerning outcomes data, rather than clear cut-offs. Given the benefits of such approaches, accreditors should build on and expand these initial efforts.

2 Recommendation: Emphasize equity. Accreditors should make equity a higher priority by requiring disaggregation of quantitative outcome metrics by race and income.

To advance equitable opportunities for students from low-income backgrounds and students of color, accreditors should require disaggregation of institutional and programmatic outcome data. Despite increased attention to overall metrics like graduation rates, accreditors collect sparse information, if any at all, on how institutions are serving historically underserved students (see Finding 4).

Data reporting requirements signal priorities. When accreditors require—or don't require—particular data elements, they send a powerful message about the importance of those data to institutions and programs. Also, by

collecting disaggregated data, they can better discern trends otherwise obscured in topline results.

The biggest barriers among accreditors to implementing this recommendation appears to be that some do not see this role as within their purview, and that some worry about misuse of disaggregated data. As we discussed in detail in Finding 4, we believe that accreditors have both a responsibility to undertake efforts that improve equity in the institutions they oversee, and that doing so will provide significant benefits to our system of higher education. Furthermore, by using disaggregated data, accreditors can help craft the narrative about what those results mean and how they should be used to improve outcomes for students.

Finding 4 also emphasizes that disaggregation is, by itself, insufficient to address systemic racial and income inequities in higher education. However, disaggregated data reporting is a necessary prerequisite to understanding where and to what extent such disparities still occur. Only by being able to first ascertain where institutions and programs are not serving students of color and students from low-income backgrounds can accreditors begin to target resources and push institutions to devote more attention, effort, and spending to address poor institutional performance. Even those institutions that appear to perform well on overall metrics may demonstrate equity shortcomings when disaggregated data are available. Also, disaggregated data might reveal that an institution has made improvements toward closing the opportunity and achievement gap between students of color and white students.

3 Recommendation: Increase transparency about data-use practices. Accreditors should build on the progress established in the C-RAC report to improve data collection, and to better explain to the public, including policymakers, what data they collect, how they collect that data, and how they use that data in their review processes.

Improving data collection. Accreditors should continue their existing, proactive efforts to improve the quality of data collection and its use (similar to the valuable work that occurred as part of the C-RAC graduation rate exercise) in two respects: (1) replicate and routinize the experiment and include national and programmatic accreditors where possible and (2) do so with more data elements, disaggregated by race/ethnicity and income.

- *Replicate and routinize the C-RAC experiment across all types of accreditors.* Routinizing the graduation rate exercise would be valuable because each new iteration would bring new lessons and iterative improvements that

can be disseminated to partner accreditors, who will in turn share best practices with their member institutions. Furthermore, it would elevate the collective importance of the outcome metrics and encourage future collaboration across institutions and accreditors.

Indeed, the C-RAC report itself acknowledged the importance of continuing these efforts: "Regional accreditors will continue to monitor these efforts and to provide policymakers with information about what they are learning from monitoring and research." Accreditors have an important opportunity to help policymakers understand what is collected, how it is used, and how that translates to more effective quality assurance, which will strengthen trust in our systems of accreditation and higher education.

- ***Expand to more data elements, disaggregated by race/ethnicity and income.*** In addition to continuing the practice of evaluating institutional graduation rates, accreditors should expand to address multiple, disaggregated data points. These should include improved graduation rates (i.e. IPEDS Outcome Measures), retention rates, course completion rates, workforce outcomes, and licensure passage rates, as applicable. By expanding the project to cover other types of measures, accreditors can avoid gaming of a single metric or painting an incomplete picture of institutional performance, including, most seriously, risking overlooking other problems.

We measure what we value. When accreditors ask questions of institutions' current practices, and request data tracking the success and challenges of those practices, they signal to those institutions that these subjects are important to their accreditors. In addition, as accreditors conduct regular, ongoing outreach on a broader set of data measures, they send a powerful framing message to institutions about the importance of making data-driven decisions. This messaging also signals the importance of institutional focus on equitable educational outcomes for students of color and low-income students.

Building trust and understanding by transparently explaining what data accreditors use, how they collect it, and how they use it to make decisions. As noted in Finding 3, accreditors often claimed to use data, but only offered vague descriptions of how they used data. To avoid misunderstandings and raise the level of policymaker trust, accreditors should make commitments to publicly describe, in detail, what data they are using, how they collect that data (the specific steps they are taking with respect to their member institutions), and how they will use the tools—especially student outcome data—at their disposal. In increasing this transparency, accreditors should be clear about their own

measures of quality and their efforts to work together to develop shared metrics and thresholds, as they did in the C-RAC report.

Enhanced transparency into how decisions are made is equally important in restoring trust in the accreditation system. As we have seen in numerous other higher education contexts—and as policymakers' increased focus on how to improve accreditation has made clear—the public will not simply buy into the notion that accreditors are effectively assuring the quality and improvement of the nation's colleges and universities without evidence.

WE MEASURE WHAT WE VALUE.

Many of the accreditors we interviewed agreed that policymakers are disconnected from the accreditation process and do not understand all the tasks and responsibilities involved. For instance, during our convening, several accreditors suggested that policymakers and policy organizations could better understand the day-to-day responsibilities of accreditors, and demonstrate a commitment to understanding those responsibilities by, for example, observing a site visit or coming to speak with accreditor representatives. This feeling of misunderstanding leads to accreditors' sense that they are being forced to undertake responsibilities outside their mission, expertise, and capacity. However, without transparency from accreditors on the part of the process they use, including when specific actions are taken and why, it is difficult for policymakers or the public at large to get inside the "black box" of the accreditation process.

Providing more detail on how data are used in decisions, including evidence of the connection between outcomes and action, will provide important assurances to policymakers and the public that accreditors understand and take their role seriously as arbiters of quality. It will also provide value to accreditors—by demonstrating to policymakers and the public that accreditors themselves see value in integrating data into the quality assurance system, thus bolstering confidence in the oversight abilities of accreditors.

CONCLUSION

As institutions are using data to drive improvements in student outcomes and educational equity, accreditors also have a role to play in promoting student success for all students, especially low-income students and students of color. However, while accreditors are collecting some outcomes data, most are not yet assessing a wide spectrum of quantitative outcomes metrics; very few disaggregate performance data by race or income; and data-use practices do not seem to be thoroughly embedded in their day-to-day activities.

Recent years have shown progress in accreditors' data-use practices, as evidenced by the C-RAC graduation-rate initiative and the case studies of individual accreditor initiatives profiled in this report. Accreditors now have an opportunity to build on this progress by connecting quantitative outcomes metrics to their review processes and decisions more holistically, disaggregating metrics by race and income, and better explaining the process by which decisions are made. If policymakers continue to perceive a failure on the part of accreditors to reflect outcomes data in their quality assurance processes, they may choose to impose such requirements in law, perhaps in ways that fail to reflect the barriers and realities accreditors face.

Accreditors hold the weighty responsibility of protecting and promoting quality educational opportunities for postsecondary students of all backgrounds. To fully deliver on this charge, they must rely more heavily on quantitative student outcome data as a tool to uncover problem areas, racial and socioeconomic inequities, and examples of institutional and programmatic successes. Data alone cannot drive institutional improvement, but a data-driven culture of inquiry—led by seasoned accreditors and higher education professionals—can incite the type of improvements that today's students deserve.

DATA ALONE CANNOT DRIVE INSTITUTIONAL IMPROVEMENT, BUT A DATA-DRIVEN CULTURE OF INQUIRY—LED BY SEASONED ACCREDITORS AND HIGHER EDUCATION PROFESSIONALS—CAN INCITE THE TYPE OF IMPROVEMENTS THAT TODAY'S STUDENTS DESERVE.

APPENDIX A

Participating Commission Leaders

Barbara Brittingham, President, New England Commission of Higher
Barbara Gellman-Danley, President, and Patricia O'Brien, Senior Vice President, Higher Learning Commission
Leah Matthews, Executive Director, Distance Education Accrediting Commission
Michale McComis, Executive Director and CEO, Accrediting Commission of Career Schools and Colleges
Michael Milligan, Executive Director and CEO, ABET
Marlene Moore, Former President, and Sonny Ramaswamy, President and CEO, Northwest Commission on Colleges and Universities
Marsal Stoll, CEO, Accreditation Commission for Education in Nursing
Jamienne Studley, President and CEO, and Henry Hernandez, Former CIO, WASC Senior College and University Commission
Belle Wheelan, President, and Alexei Matveev, Director of Training and Research, Southern Association of Colleges and Schools Commission on Colleges
Richard Winn, President, Accrediting Commission for Community and Junior Colleges

APPENDIX B

Abbreviations and Acronyms

Absolute Graduation Rate (AGR)
Accrediting Commission for Community and Junior Colleges in the Western Association of Schools and Colleges (ACCJC)
Accrediting Commission of Career Schools and Colleges (ACCSC)
Accreditation Commission for Education in Nursing (ACEN)
Council for Higher Education Accreditation (CHEA)
Council of Regional Accrediting Commissions (C-RAC)
Graduation Rate Dashboard (GRD)
Higher Learning Commission (HLC)
Institute for Higher Education Policy (IHEP)
Integrated Postsecondary Education Data System (IPEDS)
IPEDS Outcome Measures (OM)
National Center for Education Statistics (NCES)
New England Commission of Higher Education (NECHE)
The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)
United States Department of Education (ED)
Unit Redemption Rate (URR)
WASC Senior College and University Commission (WSCUC)

Endnotes

- 1 The Education Trust (2016). Using data to improve student outcomes: learning from leading colleges. Retrieved from Education Trust website: https://edtrust.org/wp-content/uploads/2014/09/HigherEdPG2_UsingDatatoImproveStudentOutcomes.pdf
- 2 Our analysis and research included review of Flores, Antoinette (2018), How college accreditors miss the mark on student outcomes. Retrieved from Center for American Progress website, <https://www.americanprogress.org/issues/education-postsecondary/reports/2018/04/25/449937/college-accreditors-miss-mark-student-outcomes/>.
This study evaluated accreditors' data collection and use, examining both accreditors' data collection practices and self-studies to assess the extent to which accreditors were holding institutions accountable for the results demonstrated by those data.
- 3 Janice, A. and Voight, M., (2016), Toward convergence: a technical guide for the postsecondary metrics framework. Retrieved from Institute for Higher Education Policy website: http://www.ihep.org/sites/default/files/uploads/docs/pubs/ihep_toward_convergence.pdf
- 4 Direct assessment of student learning can take many forms, including knowledge assessments, evaluation of student portfolios, and surveys of students or employers following completion of coursework or programming. Relative to the quantitative outcome metrics we evaluate in this report, student learning measures often reflect little standardization across institutions or accreditors and making direct comparisons of such metrics therefore has less validity or reliability than the metrics evaluated in this report.
- 5 Furthermore, accreditation relies on a system of peer review whereby evaluators collect supporting evidence, both in writing and during site visits, relating to compliance with accreditors' standards. Accreditors provided us with data to support their claim that such evaluations are not mere box-checking exercises, especially when it comes to data-collection and data-use requirements. For example, one accreditor's on-site reviews last year found that about 25 percent of institutions were found out of compliance with a standard that required collection and use of evaluation data to inform institutional planning and improvement efforts—and those institutions were required to come into compliance to receive renewal of accreditation.
- 6 Council of Regional Accrediting Commissions (2018), A one-year review of the council of regional accrediting commissions' graduation rate information project. Retrieved from Council of Regional Accrediting Commissions website: https://docs.wixstatic.com/ugd/68d6c2_5bc3e173acf242e585c4c07fc8660dd9.pdf
- 7 Council of Regional Accrediting Commissions (2018), A one-year review of the council of regional accrediting commissions' graduation rate information project. Retrieved from Council of Regional Accrediting Commissions website: https://docs.wixstatic.com/ugd/68d6c2_5bc3e173acf242e585c4c07fc8660dd9.pdf
- 8 A student-level data network is one in which student-level data are matched between existing federal and institutional data sources in a secure way to produce aggregate, program, and institution-level outcome information to inform decision-making.
- 9 WASC Senior College and University Commission. Graduation rate dashboard comparative tools. Retrieved from <https://www.wscuc.org/content/graduation-rate-dashboard-comparative-tools>
- 10 See Table 1 for more detail.
- 11 Flores, Antoinette (2018), How college accreditors miss the mark on student outcomes. Retrieved from Center for American Progress website, <https://www.americanprogress.org/issues/education-postsecondary/reports/2018/04/25/449937/college-accreditors-miss-mark-student-outcomes/>
- 12 U.S. Department of Education, National Center for Education Statistics. (2018). *Digest of Education Statistics 2018*, Table 326.10. 2011 Cohort of first-time, full-time bachelor's degree seeking students at 150% regular time; U.S. Department of Education, National Center for Education Statistics. (2018). *Digest of Education Statistics 2018*, Table 302.20 and 302.30.; Nichols, A.H. and Schak, O. (2019), Broken mirrors: black student representation at public state colleges and universities. Retrieved from Education Trust website: <https://edtrust.org/wp-content/uploads/2014/09/Broken-Mirrors-Black-Student-Representation-at-Public-State-Colleges-and-Universities-March-2019.pdf>; Lumina Foundation (2019), A stronger nation: learning beyond high school builds American talent. Retrieved from Lumina Foundation website: <http://strongernation.luminafoundation.org/report/2019/#nation>
- 13 WSCUC (2017), Equity and Inclusion Policy. Retrieved from WSCUC website: <https://www.wscuc.org/content/equity-inclusion-policy>
- 14 ACCJC standard I.B.6, available at https://accjc.org/wp-content/uploads/Accreditation-Standards_-Adopted-June-2014.pdf
- 15 ACCJC standard II.A.7.
- 16 HLC criterion 1.C.2, available at <https://www.hlcommission.org/Policies/criteria-and-core-components.html>
- 17 HLC criterion 1.B.3
- 18 NECHE standard 5, available at <https://www.niche.org/resources/standards-for-accreditation/>
- 19 See, e.g. Eckerson Peters, E. (2017). *Newly released federal student outcomes data show more detail, provide better information, and increase transparency in higher education*. Washington, DC: Institute for Higher Education Policy.
- 20 The new Outcome Measures report completion and transfer information for four cohorts of students (first-time, full-time; first-time, part-time; transfer, full-time; transfer, part-time). These data are an important step forward in counting more students than the traditional IPEDS first-time, full-time graduation rate measure. They could be further improved by measuring completion and transfer outcomes at 100%, 150%, and 200% of time instead of only after 8-years, reporting transfer rates by type of receiving institution, and disaggregating by race/ethnicity.
- 21 The Education Trust (2016), Using data to improve student outcomes: learning from leading colleges. Retrieved from Education Trust website: https://edtrust.org/wp-content/uploads/2014/09/HigherEdPG2_UsingDatatoImproveStudentOutcomes.pdf
- 22 Council of Regional Accrediting Commissions (2018), A one-year review of the council of regional accrediting commissions' graduation rate information project. Retrieved from Council of Regional Accrediting Commissions website: https://docs.wixstatic.com/ugd/68d6c2_5bc3e173acf242e585c4c07fc8660dd9.pdf
- 23 For more detail, please see EducationCounsel (2016), A framework for focusing the federal role in improving quality and accountability for institutions of higher education through accreditation. Retrieved from EducationCounsel website: <http://ib5uamau5i20f0e91hn3ue14.wpengine.netdna-cdn.com/wp-content/uploads/2016/06/EducationCounsel-accreditation-reform-policy-brief-May-2016.pdf>
- 24 While it is outside the scope of this report, we recognize that accreditors that undertake such actions are subject to legal challenges with attendant litigation costs, which creates incentives against taking necessary action. Policymakers are currently evaluating whether additional legal protections for accreditors are necessary to ensure that accreditors are able to take revocation actions if warranted.
- 25 Council of Regional Accrediting Commissions (2018), A one-year review of the council of regional accrediting commissions' graduation rate information project. Retrieved from Council of Regional Accrediting Commissions website: https://docs.wixstatic.com/ugd/68d6c2_5bc3e173acf242e585c4c07fc8660dd9.pdf



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